

COHEN & GREEN

December 14, 2023

BY ECF

Hon. Ann M. Donnelly
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Payamps v. City of New York, 22-cv-00563

Dear Judge Donnelly:

This firm along with co-counsel represents the Plaintiff. We write pursuant to Your Honor's November 7, 2023 Order directing Plaintiff to provide the Court with an update regarding fee negotiations by today, and to respectfully request that the Court grant another extension of time for Plaintiff to file a fee application from tomorrow up to and including February 13, 2024. This is the second such request and Defendants consent. On October 23rd, Plaintiff provided Defendants with timesheets and a fee demand. This extension is necessary because Defense counsel has told me Defendants need another 30 days to respond to Plaintiff's fee demand.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/

Jessica Massimi

Pronouns: She/Her

COHEN&GREEN P.L.L.C.

Attorneys for Plaintiff

1639 Centre St., Suite 216

Ridgewood, New York 11385

cc:

All relevant parties by ECF.